



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS:JN/DKK
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 18, 2019

By Email and ECF

James M. Cole
Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-2) (AMD)

Dear Counsel:

Enclosed please find the government's second production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous production on June 11, 2019. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Buddecomm Report: Iran Telecoms, Mobile and Broadband Statistics and Analyses	Discovery Materials ("DM")	DOJ_HUAWEI_B_0000000812-854
Document from LinkedIn	DM	DOJ_HUAWEI_B_0000000855-856
Huawei Technologies Co., Ltd. ("Huawei") Employment Agreements	DM	DOJ_HUAWEI_B_0000000857-915
Huawei Production to the Department of Commerce	DM	DOJ_HUAWEI_B_0000000916-2925
News Articles	DM	DOJ_HUAWEI_B_0000002926-2951
Shipping Records and Related Documents	DM	DOJ_HUAWEI_B_0000002952-3260
Huawei Presentations to the Department of Commerce	DM	DOJ_HUAWEI_B_0000003261-3294
Translations of Speeches ¹	DM	DOJ_HUAWEI_B_0000003295-3316
Redacted Report of July 11, 2007 Interview	DM	DOJ_HUAWEI_B_0000003317-3327

¹ Any translations produced are in their draft form. The government will provide final translations of any documents it may use as trial exhibits in advance of trial.

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Huawei letter to the Department of Commerce, Dated June 29, 2017	DM	DOJ_HUAWEI_B_0000003328-3400
Huawei and Huawei Investment & Holding Co., Ltd. Annual Reports 2006-2017	DM	DOJ_HUAWEI_B_0000003401-4597
Travel Records for Defendant Wanzhou Meng	DM	DOJ_HUAWEI_B_0000004598-4622
Other Travel Records	Sensitive Discovery Material (“SDM”)	DOJ_HUAWEI_B_0000004623-4706
Corporate Document dated August 25, 2011	DM	DOJ_HUAWEI_B_0000004707-4715
Financial Institution Documents, Including Customer Account Information, Written Correspondence and Transactional Data	DM/SDM ²	DOJ_HUAWEI_A_0000055657-766047

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Julia Nestor
Alexander A. Solomon
Julia Nestor
David K. Kessler
Kaitlin Farrell
Sarah Evans
Assistant United States Attorneys
(718) 254-7000

² Attached hereto is a chart including the financial institution documents marked as SDM.

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Laura Billings
Laura Billings
Christian J. Nauvel
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

Enclosures

cc: Clerk of the Court (AMD) (by ECF) (with Attachment/without Enclosures)